

HOPE'S

Windows, Inc.

November 30, 2001

Ms. Gloria Blue
Executive Secretary
Trade Policy Staff Committee
OFFICE OF THE U.S. TRADE REPRESENTATIVE
600 17th Street, N.W.
Washington, DC 20508

Re: Comments on Possible Actions Under Section 203—Certain Steel
Products—Exclusion Request

Dear Ms. Blue:

At the advice of Mr. Andrew Stephens, Director of Steel Trade Policy, please consider this request from Hope's Windows, Inc. to exclude special hot-rolled steel window sections from any action the Administration may take with respect to imported steel products under Section 203. The custom steel shapes used to produce steel windows are not produced by the United States steel industry. Thus, any quantitative restrictions or additional duties imposed on these products would provide no benefit whatsoever to the U.S. steel industry and would cause grave injury to our company.

Hope's produces high quality, custom steel windows and doors for residential and commercial applications. We have been at our Jamestown, New York location since 1912 and currently employ 250 people. We are a member of the Steel Window Institute (SWI), an association of American steel window manufacturers. We are a growing industry with annual sales of \$50 to 60 million.

Our steel windows are made from hot-rolled carbon small bar shapes under 80 mm in height, HTS 7216.10.0050. There are 24 different steel profiles used to make up many different styles and configurations of steel windows and doors. All of these profiles were designed by us and are custom produced for us by a specialized steel mill, Montanstahl AG of Switzerland. We are not aware of any qualified United States producer of special sections willing to roll these custom sections. The annual volume is relatively low and the shapes are difficult to achieve.

In the mid-1980's, import restrictions were imposed on these products. Darlington and Simpson Rolling Mills, PLC (DSRM) of the UK then produced our sections. DSRM has since gone out of business, but at that time we

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were granted short supply licenses for our sections. Please refer to the attached letter from the U.S. Department of Commerce dated August 13, 1986.

Also attached is a copy our exclusion request letter and data sheet submitted to the USITC on October 16, 2001.

The imposition of quantitative restrictions or tariffs on special sections would provide no benefit whatsoever to the United States steel industry while seriously injuring the United States steel window industry. Accordingly, we respectfully request that the Administration exclude HTS 7216.10.0050 steel that is used in the production of window frames from the coverage of any import relief provided under Section 203.

Sincerely,

HOPE'S WINDOWS, INC.

A handwritten signature in black ink, appearing to read "D. A. Lausterer", with a long horizontal flourish extending to the right.

Daniel A. Lausterer
Materials Manager

Enclosures

Cc: Frank A. Farrell, Jr.—President & CEO Hope's Windows, Inc.
Andrew Stevens—Director of Steel Trade Policy, USTR
astephens@ustr.gov
The Honorable Amo Houghton
c/o hugh.hatcher@mail.house.gov



UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

13 AUG 1986

RECEIVED
AUG 18 1986

Mr. Alexander W. Sierck
Beveridge & Diamond, P.C.
1333 New Hampshire Ave., N.W.
Washington D.C. 20036

Dear Mr. Sierck:

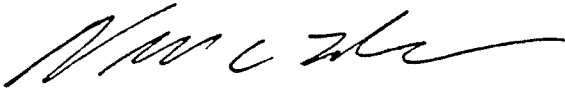
This is in response to your 1986 request on behalf of Darlington & Simpson Rolling Mills, PLC (DSRM) and Hope's Architectural Windows (Hope's) that we determine that short supply exists for five carbon steel special sections.

After carefully examining the domestic steel industry's capability to manufacture the five window sections subject to this request, the Department has determined that the U.S. industry currently is unable to meet domestic demand for these products. Therefore, we are authorizing the EC to issue special short supply licenses for a total of 350 net tons of these five sections.

All "special issue licenses" must be clearly marked and are valid only for the five sections included in this request. The products must be exported from the EC by December 31, 1986. If DSRM and Hope's require additional EC export licenses for this product, they must submit another short supply request.

If you have any questions regarding this determination, please contact me.

Sincerely,



Nicholas C. Tolerico
Acting Director
Office of Agreements Compliance



HOPE'S

Windows, Inc.

October 16, 2001

Mr. D.J. Na
UNITED STATES INTERNATIONAL TRADE COMMISSION
500 E Street, SW
Washington, DC 20436

Re: Request for Exclusion, Investigation No. TA-201-73

Dear Mr. Na:

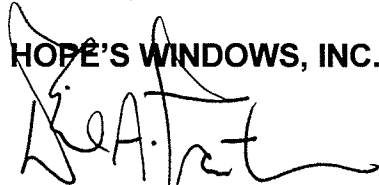
Our company produces steel window frames made from custom hot-rolled carbon steel small bar shapes under 80mm in height (HTS 7216.10.0050). The only source for these products is Montanstahl AG in Switzerland.

We hereby request that HTS 7216.10.0050 steel that is used in the production of window frames be excluded from the Section 201 investigation. Attached is a completed exclusion request data sheet. The quantities and values shown are for imports made specifically by our company and do not represent imports by the entire domestic steel window industry.

We thank you for your consideration and are available to discuss this matter with you at any time.

Sincerely,

HOPE'S WINDOWS, INC.



Daniel A. Lausterer
Materials Manager

VIA FACSIMILE-2 Pages



UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, DC



STEEL, Inv. No. TA-201-73

EXCLUSION REQUEST DATA SHEET

If you are interested in requesting that specific products be excluded from this investigation, please supply the following information to the Commission by no later than Wednesday, October 17, 2001. Complete a separate exclusion request form for every product you are requesting an exclusion for. You may fax the completed form to the attention of D.J. Na at 202-205-3205.

Firm: Hope's Windows, Inc.				Fax #: (716) 665-7043			
Contact person: Daniel A. Lausterer				Email address: dlausterer@hopeswindows.com			
Have you submitted an exclusion request in a previous letter? No							
HTS number(s) covering the product requested for exclusion: 7216.10.0050							
Detailed description of product requested for exclusion (please do not only refer to the model number): Custom hot rolled carbon steel small bar shapes under 80mm in height used in manufacturing of steel windows.							
Quantity (in short tons) of U.S. imports of product requested for exclusion:							
Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Canada							
Mexico							
All others	330	480	415	470	325	180	225
Total							
Value (landed, duty-paid in U.S. dollars) of U.S. imports of product requested for exclusion:							
Source	(thousand) 1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Canada							
Mexico							
All others	\$475	\$691	\$623	\$733	\$507	\$281	\$351
Total							
Estimated quantity (in short tons) of U.S. producers' U.S. commercial shipments (not including internal consumption or exports) of product requested for exclusion (please indicate basis for estimates):							
Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Total							